

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION**

CAREER COUNSELING, INC. d/b/a)	
SNELLING STAFFING SERVICES,)	
individually and as the representative of a)	
class of similarly-situated persons,)	
)	Case No. 3:16-cv-03013-JMC
Plaintiff,)	
)	
v.)	
)	
AMERIFACTORS FINANCIAL GROUP,)	
LLC, and JOHN DOES 1-5,)	
)	
Defendants.)	

PLAINTIFF’S UNOPPOSED MOTION TO FILE DOCUMENTS UNDER SEAL

Plaintiff, Career Counseling, Inc., (“Plaintiff”), through its undersigned attorneys, pursuant Local Rule 5.03 and the Consent Confidentiality Order (Doc. 183) entered by the Court respectfully requests that the Court grant Plaintiff leave to file specific document under seal.

1. Pursuant to Local Rule 5.03(B), the document sought to be filed under seal is as follows:

November 13, 2020 correspondence received from Verizon Security Subpoena Compliance in response to Plaintiff’s issued subpoena and specifically labeled “VERIZON CONFIDENTIAL.”

2. Verizon designated its correspondence in response to Plaintiff’s subpoena as Confidential. The parties agree that this document is Confidential and should remain Confidential under the terms of the Consent Confidentiality Order. (Doc. 183).

3. Here, the correspondence received from Verizon was labeled “VERIZON CONFIDENTIAL” and should be treated as such. Plaintiff respectfully submits that this document should be filed under seal as Exhibit 29 to Plaintiff’s reply in support of its Rule 23 motion for class certification.

Local Rule 7.02 Statement

Pursuant to Local Rule 7.02, Plaintiff's counsel Ryan M. Kelly has conferred with opposing counsel regarding the relief sought in this motion and was advised AFGL does not object to said relief.

Local Rule 5.03(B) Statement

Pursuant to Local Rule 5.03(B), Plaintiff's counsel Ryan M. Kelly certifies that he has complied with all the requirements under Local Rule 5.03.

WHEREFORE, for the foregoing the reasons stated herein, Plaintiff respectfully requests that the Court enter the proposed order attached hereto as Exhibit A permitting Plaintiff to file the document under seal in accordance with the procedures of this Court.

Respectfully submitted,

CAREER COUNSELING, INC., d/b/a SNELLING
STAFFING SERVICES, individually and as the
representative of a class of similarly-situated
persons.

By: /s/ John G. Felder, Jr.
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And

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Attorneys for Plaintiff and the Class

CERTIFICATE OF SERVICE

I hereby certify that on April 30, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all attorneys of record.

By: /s/ John G. Felder, Jr. _____
John G. Felder, Jr.